

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ARBUTUS BIOPHARMA CORPORATION)	
and GENEVANT SCIENCES GmbH,)	
)	
Plaintiffs,)	
)	C.A. No. 22-252 (MSG)
v.)	
)	
MODERNA, INC. and MODERNATX, INC.)	
)	
Defendants.)	

**JOINT MOTION AND [PROPOSED] ORDER TO SEAL
PORTIONS OF MODERNA’S OPPOSITION TO PLAINTIFFS’ MOTION TO COMPEL
AND EXHIBITS (D.I. 196)**

Pursuant to the Protective Order (D.I. 91) as modified by the Court’s November 14, 2023 Order (D.I. 155), the parties jointly move this Court for an order granting leave to file partially redacted versions of Moderna’s Opposition to Plaintiffs’ Motion to Compel (D.I. 196) (“Moderna’s Opposition”) and Exhibits C, F, G, H, K, M and N thereto (collectively, the “Confidential Materials”).

The parties’ joint motion to seal and supporting papers redact the parties’ confidential information. The Confidential Materials either include, or reference and/or quote, the parties’ sensitive and confidential information. The grounds for the motion are set forth in the parties’ joint brief in support of this motion, as well as the declarations of Peter Wojciechowski, Dan Staner, and Pete Zorn attached thereto. Redacted versions of the exhibits will be filed separately on the docket.

WHEREFORE, the parties respectfully request that the Court grant the parties’ joint motion and enter the enclosed order permitting the parties to file redacted versions of the above documents.

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January 25, 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ARBUTUS BIOPHARMA CORPORATION)	
and GENEVANT SCIENCES GmbH,)	
)	
Plaintiffs,)	
)	C.A. No. 22-252 (MSG)
v.)	
)	
MODERNA, INC. and MODERNATX, INC.)	
)	
Defendants.)	
)	

[PROPOSED] ORDER

The Court, having considered the parties' Joint Motion to Seal (the "Motion"), IT IS
HEREBY ORDERED this ____ day of _____, 2024 that the Motion is GRANTED.

Leave is given for Moderna to file Moderna's Opposition (D.I. 196) and Exhibits C, F, G,
H, K, M, and N in redacted form.

United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on January 25, 2024, upon the following in the manner indicated:

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